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FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) OFFICE OF AIR QUALITY

**NUTEC Coatings
1602 Wabash Ave.
Fort Wayne, Indiana 46801**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

The Permittee must comply with all conditions of this permit. Noncompliance with any provision of this permit is grounds for enforcement action; permit termination, revocation and reissuance, or modification; and denial of a permit renewal application. It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in Section B, Emergency Provisions.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-8 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17. This permit also addresses new source review requirements and is intended to fulfill the new source review procedures and permit revision requirements pursuant to 326 IAC 2-8-11.1, applicable to those conditions.

Operation Permit No.: F 003-18344-00329	
Issued by: Original signed by Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: April 23, 2004 Expiration Date: April 23, 2009

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SECTION A

SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in Conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-8-3(b)]

The Permittee owns and operates a stationary metal finishing source.

Authorized individual:	President
Source Address:	1602 Wabash Ave., Fort Wayne, IN 46801
Mailing Address:	P.O. Box 15291, Fort Wayne, IN 46885
General Source Phone:	(260) 422-2494
SIC Code:	3479
Source Location Status:	Allen
	Attainment for all criteria pollutants
Source Status:	Federally Enforceable State Operating Permit (FESOP)
	Minor Source, under PSD Rules;
	Minor Source, Section 112 of the Clean Air Act

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

This stationary source consists of the following emission units and pollution control devices:

- (a) One (1) E-coat line, identified as EU-20A, a dipping operation not exhausting through a stack, capacity: 1,254 metal parts per hour.
- (b) One (1) drying oven, identified as EU-20B, fired by natural gas, exhausting to stack S/V-16, heat input capacity: 2.5 million British thermal units per hour.
- (c) One (1) Ransburg oven, identified as EU-06, constructed in October 1971, fired by natural gas, exhausting to stack S/V-06, heat input capacity: 5.0 million British thermal units per hour.
- (d) One (1) batch oven, identified as EU-08, constructed in June 1991, fired by natural gas, exhausting to stack S/V-08, heat input capacity: 1.0 million British thermal units per hour.
- (e) One (1) Ransburg spray booth, constructed in November 1971, consisting of:
 - (1) One (1) automated spray booth, identified as EU-09A, equipped with electrostatic disk spray applicators and dry filters for overspray control, exhausting to stack S/V-09, capacity: 68 metal parts per hour.
 - (2) One (1) hand spray booth, identified as EU-09B, equipped with air atomized spray applicators and dry filters for overspray control, exhausting to stack S/V-10, capacity: 68 metal parts per hour.
 - (3) One (1) flash-off area, identified as EU-09C, exhausting to stack S/V-11, capacity: 68 metal parts per hour.

- (f) One (1) finishing spray line, constructed in September 1978, with a total capacity of 34 metal parts per hour, consisting of:
 - (1) One (1) finish spray booth south, identified as EU-12A, equipped with air atomized spray guns and dry filters for overspray control, exhausting to stack S/V-12.
 - (2) One (1) finish spray booth north, identified as EU-12B, equipped with air atomized spray guns and dry filters for overspray control, exhausting to stack S/V-13.
- (g) One (1) silk screen oven, identified as EU-17, constructed in October 1971, fired by natural gas, exhausting to stack S/V-17, heat input capacity: 5.00 million British thermal units per hour.
- (h) One (1) powder coat line, constructed in June 1997, consisting of:
 - (1) One (1) dry off oven, identified as EU-19A, fired by natural gas, exhausting to stacks S/V-19 and S/V-20, heat input capacity: 2.5 million British thermal units per hour.
 - (2) Two (2) curing ovens, identified as EU-19C, fired by natural gas, exhausting to stacks S/V-21 and S/V-22, heat input capacity: 3.5 million British thermal units per hour, total.
 - (3) Two (2) powder spray booths, identified as EU-19B, using electro-deposition of coatings and a dry filter, not exhausting through a stack, capacity: 46 metal parts per hour and 5.75 pounds of coating per hour, total.
- (i) One (1) boiler, identified as EU-01, constructed in August 1964, fired by natural gas or a combination of 0-2.5% Butane and 97.5-100% Propane, exhausting to stack S/V-01, heat input capacity: 25.2 million British thermal units per hour.
- (j) One (1) boiler, identified as EU-02, constructed in August 1964, fired by natural gas or a combination of 0-2.5% Butane and 97.5-100% Propane, exhausting to stack S/V-02, heat input capacity: 25.2 million British thermal units per hour.

A.3 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-8-3(c)(3)(I)]

This stationary source also includes the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million BTU per hour, including one (1) boiler, constructed in 2004, rated at 0.000960 million British thermal units per hour. [326 IAC 6-2-4]
- (b) Combustion source flame safety purging on startup.
- (c) The following VOC and HAP storage containers:

Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids.
- (d) Application of oils, greases, lubricants or other nonvolatile materials applied as temporary protective coatings.

- (e) Machining where an aqueous cutting coolant continuously floods the machining interface.
- (f) Solvent recycling systems with batch capacity less than or equal to 100 gallons.
- (g) Activities associated with the treatment of wastewater streams with an oil and grease content less than or equal to one percent (1%) by volume.
- (h) Noncontact cooling tower systems with either of the following:
 - (1) Natural draft cooling towers not regulated under a NESHAP.
 - (2) Forced and induced draft cooling tower system not regulated under a NESHAP.
- (i) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.
- (j) Heat exchanger cleaning and repair.
- (k) Paved and unpaved roads and parking lots with public access.
- (l) Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower.

A.4 FESOP Applicability [326 IAC 2-8-2]

This stationary source, otherwise required to have a Part 70 permit as described in 326 IAC 2-7-2(a), has applied to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) for a Federally Enforceable State Operating Permit (FESOP).

A.5 Prior Permits Superseded [326 IAC 2-1.1-9.5]

- (a) All terms and conditions of previous permits issued pursuant to permitting programs approved into the state implementation plan have been either
 - (1) incorporated as originally stated,
 - (2) revised, or
 - (3) deletedby this permit.
- (b) All previous registrations and permits are superseded by this permit.

SECTION B GENERAL CONDITIONS

B.1 Permit No Defense [IC 13]

Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a FESOP under 326 IAC 2-8.

B.2 Definitions [326 IAC 2-8-1]

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2, and 326 IAC 2-7) shall prevail.

B.3 Permit Term [326 IAC 2-8-4(2)] [326 IAC 2-1.1-9.5]

This permit is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date.

B.4 Enforceability [326 IAC 2-8-6]

Unless otherwise stated, all terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM, the United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act.

B.5 Termination of Right to Operate [326 IAC 2-8-9] [326 IAC 2-8-3(h)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-8-3(h) and 326 IAC 2-8-9.

B.6 Severability [326 IAC 2-8-4(4)]

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

B.7 Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]

This permit does not convey any property rights of any sort, or any exclusive privilege.

B.8 Duty to Provide Information [326 IAC 2-8-4(5)(E)]

- (a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1). Upon request, the Permittee shall also furnish to IDEM, OAQ, copies of records required to be kept by this permit.
- (b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1 when furnishing copies of requested records directly to U.S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

B.9 Compliance Order Issuance [326 IAC 2-8-5(b)]

IDEM, OAQ may issue a compliance order to this Permittee upon discovery that this permit is in nonconformance with an applicable requirement. The order may require immediate compliance or contain a schedule for expeditious compliance with the applicable requirement.

B.10 Certification [326 IAC 2-8-3(d)] [326 IAC 2-8-4(3)(C)(i)] [326 IAC 2-8-5(1)]

- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by an authorized individual of truth, accuracy, and completeness. This certification, shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification.
- (c) An authorized individual is defined at 326 IAC 2-1.1-1(1).

B.11 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]

- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The initial certification shall cover the time period from the date of final permit issuance through December 31 of the same year. All subsequent certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than July 1 of each year to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
 - (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
 - (2) The compliance status;
 - (3) Whether compliance was continuous or intermittent;
 - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-8-4(3); and
 - (5) Such other facts as specified in Sections D of this permit, IDEM, OAQ, may require to determine the compliance status of the source.

The notification which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

B.12 Preventive Maintenance Plan [326 IAC 1-6-3] [326 IAC 2-8-4(9)] [326 IAC 2-8-5(a)(1)]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) within ninety (90) days after issuance of this permit, including the following information on each facility:

- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
- (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
- (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If due to circumstances beyond the Permittee's control, the PMPs cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

The PMP extension notification does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) The Permittee shall implement the PMPs, including any required record keeping, as necessary to ensure that failure to implement a PMP does not cause or contribute to an exceedance of any limitation on emissions or potential to emit.
- (c) A copy of the PMPs shall be submitted to IDEM, OAQ, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ, may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMP does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (d) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation, Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

B.13 Emergency Provisions [326 IAC 2-8-12]

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-8-12.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describes the following:
 - (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
 - (2) The permitted facility was at the time being properly operated;

- (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
- (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone No.: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section) or,

Telephone No.: 317-233-5674 (ask for Compliance Section)

Facsimile No.: 317-233-5967

- (5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-8-4(3)(C)(ii) and must contain the following:

- (A) A description of the emergency;
- (B) Any steps taken to mitigate the emissions; and
- (C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) IDEM, OAQ may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(c)(6) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAQ by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-8 and any other applicable rules.

- (g) Operations may continue during an emergency only if the following conditions are met:
- (1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
 - (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
 - (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
 - (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.
- Any operations shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.
- (h) The Permittee shall include all emergencies in the Quarterly Deviation and Compliance Monitoring Report.

B.14 Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]

- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provision), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. A deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does need to be included in this report.

The Quarterly Deviation and Compliance Monitoring Report does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.

**B.15 Permit Modification, Reopening, Revocation and Reissuance, or Termination
[326 IAC 2-8-4(5)(C)] [326 IAC 2-8-7(a)] [326 IAC 2-8-8]**

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a FESOP modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-8-4(5)(C)] The notification by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:
 - (1) That this permit contains a material mistake.
 - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
 - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-8-8(a)]
- (c) Proceedings by IDEM, OAQ to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-8-8(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-8-8(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(c)]

B.16 Permit Renewal [326 IAC 2-8-3(h)]

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-8-3. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, IN 46206-6015

- (b) Timely Submittal of Permit Renewal [326 IAC 2-8-3]
 - (1) A timely renewal application is one that is:
 - (A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
 - (B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
 - (2) If IDEM, OAQ, upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect until the renewal permit has been issued or denied.

- (c) Right to Operate After Application for Renewal [326 IAC 2-8-9]
If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-8 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ any additional information identified as needed to process the application.

B.17 Permit Amendment or Revision [326 IAC 2-8-10] [326 IAC 2-8-11.1]

- (a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11.1 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:
- Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015
- Any such application shall be certified by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) The Permittee may implement the administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]
- (d) No permit amendment or modification is required for the addition, operation or removal of a nonroad engine, as defined in 40 CFR 89.2.

B.18 Operational Flexibility [326 IAC 2-8-15] [326 IAC 2-8-11.1]

- (a) The Permittee may make any change or changes at this source that are described in 326 IAC 2-8-15(b) through (d), without prior permit revision, if each of the following conditions is met:
- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
- (2) Any approval required by 326 IAC 2-8-11.1 has been obtained;
- (3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
- (4) The Permittee notifies the:
- Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015
- and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

- (5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-8-15(b) through (d) and makes such records available, upon reasonable request, to public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ in the notices specified in 326 IAC 2-8-15(b)(2), (c)(1), and (d).

- (b) Emission Trades [326 IAC 2-8-15(c)]
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-8-15(c).
- (c) Alternative Operating Scenarios [326 IAC 2-8-15(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-8-4(7). No prior notification of IDEM, OAQ or U.S. EPA is required.

B.19 Permit Revision Requirement [326 IAC 2-8-11.1]

A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2 and 326 IAC 2-8-11.1.

B.20 Inspection and Entry [326 IAC 2-8-5(a)(2)] [IC 13-14-2-2] [IC 13-17-3-2] [IC 13-17-3-2] [IC13-30-3-1]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a FESOP source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and

- (e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.21 Transfer of Ownership or Operational Control [326 IAC 2-8-10] [IC 13-17-3-2]

- (a) The Permittee must comply with the requirements of 326 IAC 2-8-10 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The application which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

B.22 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16] [326 IAC 2-1.1-7]

- (a) The Permittee shall pay annual fees to IDEM, OAQ, within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.
- (b) Failure to pay may result in administrative enforcement action, or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4320 (ask for OAQ, I/M & Billing Section), to determine the appropriate permit fee.

B.23 Advanced Source Modification Approval [326 IAC 2-8-4(11)] [326 IAC 2-1.1-9]

- (a) The requirements to obtain a permit revision under 326 IAC 2-8-11.1 are satisfied by this permit for the proposed emission units, control equipment or insignificant activities in Sections A.2 and A.3.
- (b) Pursuant to 326 IAC 2-1.1-9 any permit authorizing construction may be revoked if construction of the emission unit has not commenced within eighteen (18) months from the date of issuance of the permit, or if during the construction work is suspended for a continuous period of one (1) year or more.

SECTION C

SOURCE OPERATION CONDITIONS

Entire Source

Emissions Limitations and Standards [326 IAC 2-8-4(1)]

C.1 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [40 CFR 52 Subpart P] [326 IAC 6-3-2]

- (a) Pursuant to 40 CFR 52 Subpart P, particulate matter emissions from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.
- (b) Pursuant to 326 IAC 6-3-2(e)(2), particulate emissions from any process not exempt under 326 IAC 6-3-1(b) or (c) which has a maximum process weight rate less than 100 pounds per hour and the methods in 326 IAC 6-3-2(b) through (d) do not apply shall not exceed 0.551 pounds per hour.

C.2 Overall Source Limit [326 IAC 2-8]

The purpose of this permit is to limit this source's potential to emit to less than major source levels for the purpose of Section 502(a) of the Clean Air Act.

- (a) Pursuant to 326 IAC 2-8:
 - (1) The potential to emit any regulated pollutant, except particulate matter (PM), from the entire source shall be limited to less than one-hundred (100) tons per twelve (12) consecutive month period.
 - (2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and
 - (3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.
- (b) This condition shall include all emission points at this source including those that are insignificant as defined in 326 IAC 2-7-1(21). The source shall be allowed to add insignificant activities not already listed in this permit, provided that the source's potential to emit does not exceed the above specified limits.
- (c) Section D of this permit contains independently enforceable provisions to satisfy this requirement.

C.3 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

C.4 Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1.

C.5 Incineration [326 IAC 4-2] [326 IAC 9-1-2(3)]

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and in 326 IAC 9-1-2.

C.6 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions).

C.7 Operation of Equipment [326 IAC 2-8-5(a)(4)]

Except as otherwise provided by statute, rule or in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.

C.8 Stack Height [326 IAC 1-7]

The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted.

C.9 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
 - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
 - (2) If there is a change in the following:
 - (A) Asbestos removal or demolition start date;
 - (B) Removal or demolition contractor; or
 - (C) Waste disposal site.

- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (e) **Procedures for Asbestos Emission Control**
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1 emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **Demolition and renovation**
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).
- (g) **Indiana Accredited Asbestos Inspector**
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement to use an Indiana Accredited Asbestos inspector is not federally enforceable.

Testing Requirements [326 IAC 2-8-4(3)]

C.10 Performance Testing [326 IAC 3-6]

- (a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ if the Permittee submits to IDEM, OAQ a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

C.11 Compliance Requirements [326 IAC 2-1.1-11]

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements by issuing an order under 326 IAC 2-1.1-11. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U.S. EPA.

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

C.12 Compliance Monitoring [326 IAC 2-8-4(3)] [326 IAC 2-8-5(a)(1)]

Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated within *ninety (90) days*, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

in writing, prior to the end of the initial ninety (90) day compliance schedule with full justification of the reasons for inability to meet this date.

The notification which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Unless otherwise specified in the approval for the new emissions unit, compliance monitoring for new emission units or emission units added through a permit revision shall be implemented when operation begins.

C.13 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

Any monitoring or testing required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, 40 CFR 60 Appendix B, 40 CFR 63 or other approved methods as specified in this permit.

Corrective Actions and Response Steps [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

C.14 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68]

If a regulated substance as defined in 40 CFR 68 is present at a source in more than a threshold quantity, the Permittee must comply with the applicable requirements of 40 CFR 68.

C.15 Compliance Response Plan - Preparation, Implementation, Records, and Reports [326 IAC 2-8-4] [326 IAC 2-8-5]

(a) The Permittee is required to prepare a Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. A CRP shall be submitted to IDEM, OAQ upon request. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee, supplemented from time to time by the Permittee, maintained on site, and is comprised of:

- (1) Reasonable response steps that may be implemented in the event that a response step is needed pursuant to the requirements of Section D of this permit; and an expected time frame for taking reasonable response steps.
- (2) If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current Compliance Response Plan and the Permittee documents such response in accordance with subsection (e) below, the Permittee shall amend its Compliance Response Plan to include such response steps taken.

(b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition as follows:

- (1) Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan; or
- (2) If none of the reasonable response steps listed in the Compliance Response Plan is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.
- (3) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, and it will be ten (10) days or more until the unit or device will be shut down, then the Permittee shall promptly notify the IDEM, OAQ of the expected date of the shut down. The notification shall also include the status of the applicable compliance monitoring parameter with respect to normal, and the results of the response actions taken up to the time of notification.
- (4) Failure to take reasonable response steps shall be considered a deviation from the permit.

(c) The Permittee is not required to take any further response steps for any of the following reasons:

- (1) A false reading occurs due to the malfunction of the monitoring equipment and prompt action was taken to correct the monitoring equipment.

- (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied.
- (3) An automatic measurement was taken when the process was not operating.
- (4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.
- (d) When implementing reasonable steps in response to a compliance monitoring condition, if the Permittee determines that an exceedance of an emission limitation has occurred, the Permittee shall report such deviations pursuant to Section B-Deviations from Permit Requirements and Conditions.
- (e) The Permittee shall record all instances when response steps are taken. In the event of an emergency, the provisions of 326 IAC 2-8-12 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.
- (f) Except as otherwise provided by a rule or provided specifically in Section D, all monitoring as required in Section D shall be performed when the emission unit is operating, except for time necessary to perform quality assurance and maintenance activities.

C.16 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4] [326 IAC 2-8-5]

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.
- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The response action documents submitted pursuant to this condition do require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]

C.17 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]

- (a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

- (b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.18 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]

- (a) The source shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "authorized individual" as defined by 326 IAC2-1.1-1(1).
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:
- Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (e) The first report covered the period commencing on the date of issuance of the original FESOP and ended on the last day of the reporting period. All subsequent reporting periods shall be based on calendar years.

Stratospheric Ozone Protection

C.19 Compliance with 40 CFR 82 and 326 IAC 22-1

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

- (a) Persons opening appliances for maintenance, service, repair or disposal must comply with the required practices pursuant to 40 CFR 82.156
- (b) Equipment used during the maintenance, service, repair or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- (c) Persons performing maintenance, service, repair or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]:

- (a) One (1) E-coat line, identified as EU-20A, a dipping operation not exhausting through a stack, capacity: 1,254 metal parts per hour.
- (b) One (1) drying oven, identified as EU-20B, fired by natural gas, exhausting to stack S/V-16, heat input capacity: 2.5 million British thermal units per hour.
- (c) One (1) Ransburg oven, identified as EU-06, constructed in October 1971, fired by natural gas, exhausting to stack S/V-06, heat input capacity: 5.0 million British thermal units per hour.
- (d) One (1) batch oven, identified as EU-08, constructed in June 1991, fired by natural gas, exhausting to stack S/V-08, heat input capacity: 1.0 million British thermal units per hour.
- (e) One (1) Ransburg spray booth, constructed in November 1971, consisting of:
 - (1) One (1) automated spray booth, identified as EU-09A, equipped with electrostatic disk spray applicators and dry filters for overspray control, exhausting to stack S/V-09, capacity: 68 metal parts per hour.
 - (2) One (1) hand spray booth, identified as EU-09B, equipped with air atomized spray applicators and dry filters for overspray control, exhausting to stack S/V-10, capacity: 68 metal parts per hour.
 - (3) One (1) flash-off area, identified as EU-09C, exhausting to stack S/V-11, capacity: 68 metal parts per hour.
- (f) One (1) finishing spray line, constructed in September 1978, with a total capacity of 34 metal parts per hour, consisting of:
 - (1) One (1) finish spray booth south, identified as EU-12A, equipped with air atomized spray guns and dry filters for overspray control, exhausting to stack S/V-12.
 - (2) One (1) finish spray booth north, identified as EU-12B, equipped with air atomized spray guns and dry filters for overspray control, exhausting to stack S/V-13.
- (g) One (1) silk screen oven, identified as EU-17, constructed in October 1971, fired by natural gas, exhausting to stack S/V-17, heat input capacity: 5.00 million British thermal units per hour.
- (h) One (1) powder coat line, constructed in June 1997, consisting of:
 - (1) One (1) dry off oven, identified as EU-19A, fired by natural gas, exhausting to stacks S/V-19 and S/V-20, heat input capacity: 2.5 million British thermal units per hour.
 - (2) Two (2) curing ovens, identified as EU-19C, fired by natural gas, exhausting to stacks S/V-21 and S/V-22, heat input capacity: 3.5 million British thermal units per hour, total.
 - (3) Two (2) powder spray booths, identified as EU-19B, using electro-deposition of coatings and a dry filter, not exhausting through a stack, capacity: 46 metal parts per hour and 5.75 pounds of coating per hour, total.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

THIS SECTION OF THE PERMIT IS BEING ISSUED UNDER THE PROVISIONS OF 326 IAC 2-1 AND 326 IAC 2-8-11.1, WITH CONDITIONS LISTED BELOW.

Construction Conditions

General Construction Conditions

D.1.1 Permit No Defense

This permit to construct does not relieve the Permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.

Effective Date of the Permit

D.1.2 Effective Date of the Permit [IC13-15-5-3]

Pursuant to IC 13-15-5-3, this section of this permit becomes effective upon its issuance.

D.1.3 Modification to Construction Conditions [326 IAC 2]

All requirements of these construction conditions shall remain in effect unless modified in a manner consistent with procedures established for revisions pursuant to 326 IAC 2.

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.1.4 Volatile Organic Compound (VOC) [326 IAC 8-2-9]

Pursuant to 326 IAC 8-2-9, the owner or operator of the one (1) E-coat line, identified as EU-20A, shall not allow the discharge into the atmosphere VOC in excess of three and five-tenths (3.5) pounds of VOC per gallon of coating, excluding water, as delivered to the applicator.

D.1.5 Volatile Organic Compound (VOC) Limitations, Clean-up Requirements [326 IAC 8-2-9]

Pursuant to 326 IAC 8-2-9(f), all solvents sprayed from the application equipment of the one (1) E-coat line, identified as EU-20A, during cleanup or color changes shall be directed into containers. Said containers shall be closed as soon as the solvent spraying is complete. In addition, all waste solvent shall be disposed of in such a manner that minimizes evaporation.

D.1.6 FESOP Limit [326 IAC 2-8-4]

The Permittee shall comply with the following limits, which make the requirements of 326 IAC 2-7, Part 70, not applicable:

- (a) The amount of each individual particulate HAP delivered to the applicators at the total of all coating operations at this source shall not exceed 10.0 tons per consecutive twelve (12) month period, total, with compliance determined at the end of each month, based on the minimum transfer efficiency of ten percent (10%). This limit is required to limit the potential to emit of any individual particulate HAP to no more than 9.00 tons per year from the coating operations and less than ten (10) tons per year from the entire source.
- (b) The amount of each individual volatile HAP used at the total of all coating operations at this source shall not exceed 9.00 tons per twelve (12) consecutive month period, with compliance determined at the end of each month. This limit is required to limit the potential to emit of any individual volatile HAP to no more than 9.00 tons per year from the coating operations, and less than ten (10) tons per year from the entire source.

- (c) The amount of any combination of particulate HAPs delivered to the applicators and volatile HAPs used at the total of all coating operations at this source shall not exceed 23.0 tons per twelve (12) consecutive month period, total, with compliance determined at the end of each month. This limit is required to limit the potential to emit total HAPs to less than 23.0 tons per year from the coating operations, and less than twenty-five (25) tons per year from the entire source.

D.1.7 Particulate [326 IAC 6-3-2(d)]

Pursuant to 326 IAC 6-3-2(d), particulate from the one (1) Ransburg spray booth, consisting of one (1) automatic spray booth (EU-09A) and one (1) hand spray booth (EU-09B); the one (1) finishing spray line, consisting of one (1) finish spray booth south (EU-12A) and one (1) finish spray booth north (EU-12B); and the one (1) powder spray booth at the powder coat line shall be controlled by a dry particulate filter, waterwash, or an equivalent control device, and the Permittee shall operate the control device in accordance with manufacturer's specifications.

D.1.8 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and any control devices.

Compliance Determination Requirements

D.1.9 Volatile Organic Compounds (VOC) [326 IAC 8-1-2] [326 IAC 8-1-4]

Compliance with the VOC content limitation contained in Condition D.1.4 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC data sheets. IDEM, OAQ reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

D.1.10 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks (S/V-9, 10, 12 and 13) while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.
- (b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan -Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.
- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.1.11 Record Keeping Requirements

- (a) To document compliance with Condition D.1.4, the Permittee shall maintain records in accordance with (1) through (3) below. Records maintained for (1) through (3) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC emission limits established in Condition D.1.4. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.
 - (1) The VOC content of each coating material and solvent used at the E-coat line (EU-20A).
 - (2) The amount of coating material and solvent less water used at the E-coat line (EU-20-A) on monthly basis.
 - (A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
 - (B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents; and
 - (3) The cleanup solvent usage for each month.
- (b) To document compliance with Condition D.1.6, the Permittee shall maintain records in accordance with (1) through (8) below. Records maintained for (1) through (8) shall be taken monthly and shall be complete and sufficient to establish compliance with the HAPs usage limits and the HAPs emission limits established in Condition D.1.6. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.
 - (1) The individual and total HAP content of each coating material and solvent used.
 - (2) The amount of coating material and solvent less water used on monthly basis.
 - (A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
 - (B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
 - (3) The cleanup solvent usage for each month;
 - (4) The amount of each individual particulate HAP delivered to the applicators for each month;
 - (5) The amount of total HAPs delivered to the applicators for each month;
 - (6) The amount of each individual volatile HAP used each month;
 - (7) The weight of each individual HAP emitted for each compliance period; and
 - (8) The weight of total HAPs emitted for each compliance period.

- (c) To document compliance with Condition D.1.10, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.
- (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.12 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.1.6 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

SECTION D.2

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]:

- (i) One (1) boiler, identified as EU-01, constructed in August 1964, fired by natural gas or a combination of 0-2.5% Butane and 97.5-100% Propane, exhausting to stack S/V-01, heat input capacity: 25.2 million British thermal units per hour.
- (j) One (1) boiler, identified as EU-02, constructed in August 1964, fired by natural gas or a combination of 0-2.5% Butane and 97.5-100% Propane, exhausting to stack S/V-02, heat input capacity: 25.2 million British thermal units per hour.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.2.1 Particulate [326 IAC 6-2-3]

Pursuant to 326 IAC 6-2-3 (Particulate Emission Limitations for Sources of Indirect Heating) the PM emissions from the two (2) 25.2 million British thermal units per hour heat input boilers shall be limited to 0.78 pounds per million British thermal units heat input.

This limitation is based on the following equation:

$$Pt = C \times a \times h / 76.5 \times Q^{0.75} \times N^{0.25}$$

where:

Pt = Pounds of particulate matter emitted per million British thermal units (lb/MMBtu) heat input (0.78)

Q = Total source maximum operating capacity rating in million British thermal units per hour (MMBtu/hr) heat input. The maximum operating capacity rating is defined as the maximum capacity at which the facility is operated or the nameplate capacity, whichever is specified in the facility's permit application, except when some lower capacity is contained in the facility's operation permit; in which case, the capacity specified in the operation permit shall be used. (50.4)

C = Maximum ground level concentration with respect to distance from the point source at the "critical" wind speed for level terrain. This shall equal 50 micrograms per cubic meter for a period not to exceed a sixty (60) minute time period.

N = Number of stacks in fuel burning operation. (2)

a = Plume rise factor which is used to make allowance for less than theoretical plume rise. The value 0.67 shall be used for Q less than or equal to 1,000 MMBtu/hr heat input. The value 0.8 shall be used for Q greater than 1,000 MMBtu/hr heat input.

h = Stack height in feet. (40)

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.2.2 Reporting Requirements

The natural gas boiler certification shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or its equivalent, within thirty (30) days after the end of the six (6) month period being reported. The natural gas-fired boiler certification does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1.

SECTION D.3

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]:

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million BTU per hour, including one (1) boiler, constructed in 2004, rated at 0.000960 million British thermal units per hour. [326 IAC 6-2-4]
- (b) Combustion source flame safety purging on startup.
- (c) The following VOC and HAP storage containers:
Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids.
- (d) Application of oils, greases, lubricants or other nonvolatile materials applied as temporary protective coatings.
- (e) Machining where an aqueous cutting coolant continuously floods the machining interface.
- (f) Solvent recycling systems with batch capacity less than or equal to 100 gallons.
- (g) Activities associated with the treatment of wastewater streams with an oil and grease content less than or equal to one percent (1%) by volume.
- (h) Noncontact cooling tower systems with either of the following:
 - (1) Natural draft cooling towers not regulated under a NESHAP.
 - (2) Forced and induced draft cooling tower system not regulated under a NESHAP.
- (i) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.
- (j) Heat exchanger cleaning and repair.
- (k) Paved and unpaved roads and parking lots with public access.
- (l) Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-8-4 (1)]

D.3.1 Particulate [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating) the PM emissions from the 0.00096 million British thermal units per hour heat input boiler shall be limited to 0.39 pounds per million British thermal units heat input.

This limitation is based on the following equation:

$$Pt = 1.09 / Q^{0.26}$$

where:

Pt = Pounds of particulate matter emitted per million British thermal units (lb/MMBtu) heat input (0.39)

Q = Total source maximum operating capacity rating in million British thermal units per hour (MMBtu/hr) heat input. The maximum operating capacity rating is defined as the maximum capacity at which the facility is operated or the nameplate capacity, whichever is specified in the facility's permit application, except when some lower capacity is contained in the facility's operation permit; in which case, the capacity specified in the operation permit shall be used. (50.40096)

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
CERTIFICATION**

Source Name: NUTEC Coatings
Source Address: 1602 Wabash Ave., Fort Wayne, IN 46801
Mailing Address: P.O. Box 15291, Fort Wayne, IN 46885
FESOP No.: 003-18344-00329

This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.

Please check what document is being certified:

- ☐ Annual Compliance Certification Letter
- ☐ Test Result (specify) _____
- ☐ Report (specify) _____
- ☐ Notification (specify) _____
- ☐ Affidavit (specify) _____
- ☐ Other (specify) _____

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE BRANCH
P.O. Box 6015
100 North Senate Avenue
Indianapolis, Indiana 46206-6015
Phone: 317-233-5674
Fax: 317-233-5967**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
EMERGENCY OCCURRENCE REPORT**

Source Name: NUTEC Coatings
Source Address: 1602 Wabash Ave., Fort Wayne, IN 46801
Mailing Address: P.O. Box 15291, Fort Wayne, IN 46885
FESOP No.: 003-18344-00329

This form consists of 2 pages

Page 1 of 2

- ☐ This is an emergency as defined in 326 IAC 2-7-1(12)
- The Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and
 - The Permittee must submit notice in writing or by facsimile within two (2) working days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:
Control Equipment:
Permit Condition or Operation Limitation in Permit:
Description of the Emergency:
Describe the cause of the Emergency:

If any of the following are not applicable, mark N/A

Page 2 of 2

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO ₂ , VOC, NO _x , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

A certification is not required for this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
SEMI-ANNUAL NATURAL GAS-FIRED BOILER CERTIFICATION**

Source Name: NUTEC Coatings
Source Address: 1602 Wabash Ave., Fort Wayne, IN 46801
Mailing Address: P.O. Box 15291, Fort Wayne, IN 46885
FESOP No.: 003-18344-00329

- ☐ Natural Gas Only
☐ Alternate Fuel burned

From: _____ To: _____

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION**

FESOP Quarterly Report

Source Name: NUTEC Coatings
Source Address: 1602 Wabash Ave., Fort Wayne, IN 46801
Mailing Address: P.O. Box 15291, Fort Wayne, IN 46885
FESOP No.: 003-18344-00329
Facility: All coating
Parameter: Individual particulate HAP delivered to the applicators
Limit: 10.0 tons per twelve (12) consecutive month period, with compliance determined at the end of each month

YEAR: _____

Month	Individual Particulate HAP (tons)	Individual Particulate HAP (tons)	Individual Particulate HAP (tons)
	This Month	Previous 11 Months	12 Month Total

☐ No deviation occurred in this month.

☐ Deviation/s occurred in this month.

Deviation has been reported on _____

Submitted by: _____

Title/Position: _____

Signature: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION**

FESOP Quarterly Report

Source Name: NUTEC Coatings
Source Address: 1602 Wabash Ave., Fort Wayne, IN 46801
Mailing Address: P.O. Box 15291, Fort Wayne, IN 46885
FESOP No.: 003-18344-00329
Facility: All coating
Parameter: Individual volatile HAP usage
Limit: 9.00 tons per twelve (12) consecutive month period, with compliance determined at the end of each month

YEAR: _____

Month	Volatile HAP Usage (tons)	Volatile HAP Usage (tons)	Volatile HAP Usage (tons)
	This Month	Previous 11 Months	12 Month Total

☐ No deviation occurred in this month.

☐ Deviation/s occurred in this month.

Deviation has been reported on _____

Submitted by: _____

Title/Position: _____

Signature: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION**

FESOP Quarterly Report

Source Name: NUTEC Coatings
Source Address: 1602 Wabash Ave., Fort Wayne, IN 46801
Mailing Address: P.O. Box 15291, Fort Wayne, IN 46885
FESOP No.: 003-18344-00329
Facility: All coating
Parameter: Total particulate HAPs delivered to the applicators and volatile HAPs used
Limit: 23.0 tons per twelve (12) consecutive month period, total, with compliance determined at the end of each month

YEAR: _____

Month	Total HAPs (tons)	Total HAPs (tons)	Total HAPs (tons)
	This Month	Previous 11 Months	12 Month Total

☐ No deviation occurred in this month.

☐ Deviation/s occurred in this month.

Deviation has been reported on _____

Submitted by: _____

Title/Position: _____

Signature: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: NUTEC Coatings
Source Address: 1602 Wabash Ave., Fort Wayne, IN 46801
Mailing Address: P.O. Box 15291, Fort Wayne, IN 46885
FESOP No.: 003-18344-00329

Months: _____ to _____ Year: _____

Page 1 of 2

This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked **No deviations occurred this reporting period**.

☐ NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

☐ THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD

Permit Requirement (specify permit condition #)

Date of Deviation:

Duration of Deviation:

Number of Deviations:

Probable Cause of Deviation:

Response Steps Taken:

Permit Requirement (specify permit condition #)

Date of Deviation:

Duration of Deviation:

Number of Deviations:

Probable Cause of Deviation:

Response Steps Taken:

Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

A certification is not required for this report.

Indiana Department of Environmental Management Office of Air Quality

Addendum to the Technical Support Document for Federally Enforceable State Operating Permit (FESOP)

Source Name: NUTEC Coatings
Source Location: 1602 Wabash Avenue, Fort Wayne, Indiana 46801
County: Allen
SIC Code: 3479
Operation Permit No.: 003-18344-00329
Permit Reviewer: CarrieAnn Paukowits

On March 11, 2004, the Office of Air Quality (OAQ) had a notice published in the Allen County Public, Fort Wayne, Indiana, stating that NUTEC Coatings had applied for a Federally Enforceable State Operating Permit (FESOP) to operate a metal finishing source with dry filters as control. The notice also stated that OAQ proposed to issue a FESOP for this operation and provided information on how the public could review the proposed FESOP and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this FESOP should be issued as proposed.

On March 25, 2004, Jenifer L. Aselage of the AVANT Group, consultant to the source, submitted comments on the proposed FESOP. The comments are as follows (The permit language, if changed, has deleted language as ~~strikeouts~~ and new language **bolded.**):

Comment 1:

Page 6 of 41 and page 24 of 41 currently reads:

- (h) One (1) powder coat line, constructed in June 1997, consisting of:
- (1) One (1) dry off oven, identified as EU-19A, fired by natural gas, exhausting to stacks S/V-19 and S/V-20, heat input capacity: 2.5 million British thermal units per hour.
 - (2) One (1) curing oven, identified as EU-19C, fired by natural gas, exhausting to stacks S/V-21 and S/V-22, heat input capacity: 3.5 million British thermal units per hour.
 - (3) One (1) powder spray booth, identified as EU-19B, using electrodeposition of coatings and a dry filter, not exhausting through a stack, capacity: 46 metal parts per hour and 5.75 pounds of coating per hour.

NUTEC would like for it to read as follows:

- (h) One (1) powder coat line, constructed in June 1997, consisting of:
- (1) One (1) dry off oven, identified as EU-19A, fired by natural gas, exhausting to stacks S/V-19 and S/V-20, heat input capacity: 2.5 million British thermal units per hour.
 - (2) Two (2) curing ovens, identified as EU-19C, fired by natural gas, exhausting to stacks S/V-21 and S/V-22, heat input capacity: 3.5 million British thermal units per hour.
 - (3) Two (2) powder spray booths, identified as EU-19B, using electrodeposition of coatings and a dry filter, not exhausting through a stack, capacity: 46 metal parts per hour and 5.75 pounds of coating per hour.

Response 1:

The requested changes consist of increasing the number of curing ovens and spray booths from one (1) to two (2) at the powder coat line. Since the capacity of the total of the two (2) units is equal to the capacity listed in the proposed permit, this will not change the calculated potential to emit of the source. This is only a descriptive change, and item (h) in Section A.2 and the Facility Description Box in Section D.1 has been revised as follows:

- (h) One (1) powder coat line, constructed in June 1997, consisting of:
- (1) One (1) dry off oven, identified as EU-19A, fired by natural gas, exhausting to stacks S/V-19 and S/V-20, heat input capacity: 2.5 million British thermal units per hour.
 - (2) ~~One (1)~~ **Two (2)** curing ovens, identified as EU-19C, fired by natural gas, exhausting to stacks S/V-21 and S/V-22, heat input capacity: 3.5 million British thermal units per hour, **total**.
 - (3) ~~One (1)~~ **Two (2)** powder spray booths, identified as EU-19B, using electro-deposition of coatings and a dry filter, not exhausting through a stack, capacity: 46 metal parts per hour and 5.75 pounds of coating per hour, **total**.

Comment 2:

On page 27 of 41, Condition D.1.11(a) currently reads:

- (a) To document compliance with Condition D.1.4, the Permittee shall maintain records in accordance with (1) through (3) below. Records maintained for (1) through (3) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC emission limits established in Condition D.1.4. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.
- (1) The VOC content of each coating material and solvent used at the E-coat line (EU-20A).
 - (2) The amount of coating material and solvent less water used at the E-coat line (EU-20-A) on monthly basis.
 - (A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
 - (B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents; and
 - (3) The cleanup solvent usage for each month.

NUTEC would like for the permit to read as follows, due to the fact that no solvents will be added to any of the coatings, and that all usage data will be determined from purchase orders, invoices, and MSDS rather than actual measurements at the equipment:

- (a) To document compliance with Condition D.1.4, the Permittee shall maintain record in

accordance with (1) through (3) below. Records maintained for (1) through (3) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC emission limits established in Condition D.1.4. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.

- (1) The VOC content of each coating material and solvent used at the E-coat line (EU-20A).
- (2) The amount of coating material and solvent less water used at the E-coat line (EU-20-A) on monthly basis.
 - (A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
- (3) The cleaning solvent usage for each month.
 - (A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.

Response 2:

The requested changes consist of removing "Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents" from Condition D.1.11(a)(2), and adding the type of records required to Condition D.1.11(a)(3). Although no solvents are added to the coatings at this time, it is possible that would change in the future. Therefore, the change to Condition D.1.11(a)(2) has not been made in order to minimize the need for permit revisions in the future. If no solvents are added to the coatings, than all records of solvents used should indicate that the solvent was used for cleanup. The type of records required for solvents is indicated in Condition D.1.11(a)(2) and does not need to be added to Condition D.1.11(a)(3).

Comment 3:

Condition D.1.11(b) on page 27 of 41 currently reads:

- (b) To document compliance with Condition D.1.6, the Permittee shall maintain records in accordance with (1) through (8) below. Records maintained for (1) through (8) shall be taken monthly and shall be complete and sufficient to establish compliance with the HAPs usage limits and the HAPs emission limits established in Condition D.1.6. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.
 - (1) The individual and total HAP content of each coating material and solvent used.
 - (2) The amount of coating material and solvent less water used on monthly basis.
 - (A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
 - (B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;

- (3) The cleanup solvent usage for each month;
- (4) The amount of each individual particulate HAP delivered to the applicators for each month;
- (5) The amount of total HAPs delivered to the applicators for each month;
- (6) The amount of each individual volatile HAP used each month;
- (7) The weight of each individual HAP emitted for each compliance period; and
- (8) The weight of total HAPs emitted for each compliance period.

NUTEC would like for the permit to read as follows based on the fact that all HAPs that are used will be delivered to the applicators and that all usage data will be determined from purchase orders, invoices, and MSDS rather than actual measurements at the equipment.

- (b) To document compliance with Condition D.1.6, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken monthly and shall be complete and sufficient to establish compliance with the HAPs usage limits and the HAPs emission limits established in Condition D.1.6. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.

- (1) The individual and total HAP content of each coating material and solvent used.
- (2) The amount of coating material and solvent less water used on monthly basis.
 - (A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
- (3) The cleanup solvent usage for each month;
 - (A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
- (4) The amount of each individual particulate HAP delivered to the applicators for each month;
 - (A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
- (5) The weight of each individual HAP emitted for each compliance period; and
- (6) The weight of total HAPs emitted for each compliance period

Response 3:

The requested changes include removing the record keeping requirements for individual volatile HAPs. Based on the calculations in TSD Appendix A, the unrestricted potential emissions of an individual particulate HAP is greater than ten (10) tons per year and the unrestricted potential emissions of an

individual volatile HAP is greater than ten (10) tons per year. Therefore, both particulate and volatile HAPs are limited, and record keeping is required for each limit.

The limits in the permit differentiate between particulate HAPs and volatile HAPs, because the emissions of particulate HAPs will take into account the transfer efficiency of the spray applicators.

As stated in the TSD, "The amount of each individual particulate HAP delivered to the applicators at the total of all coating operations at this source shall not exceed 10.0 tons per consecutive twelve (12) month period, total, with compliance determined at the end of each month. Based on the minimum transfer efficiency of ten percent (10%), this is equivalent to individual particulate HAP emissions of no more than 9.00 tons per year from the coating operations and less than ten (10) tons per year from the entire source." Whereas the usage rate of each individual volatile HAP is limited to 9.00 tons per year, since a conservative one hundred percent (100%) flashoff is assumed for volatile HAPs. The volatile HAP limit is based on usage, rather than the amount of each HAP delivered to the applicator, because it is not necessary to count the HAP contained in any coatings recovered after being delivered to the applicators as HAP emissions. In addition, there are potential HAP emissions from the dipping operations, and HAPs usage is a better indication of those emissions.

Since the limits in the permit are different for particulate HAPs and volatile HAPs, the records kept must also differentiate between particulate HAPs and volatile HAPs. The record keeping requirements in the permit represent the minimum required record keeping. Records of the individual particulate HAPs delivered to the applicators are more conservative the individual HAPs usage for the spray coating operations. Therefore, the permit does not need to be changed to indicate that records of the individual volatile HAPs delivered to the applicators are acceptable for HAPs usage limitations.

The other requested changes consist of removing item (B) from Condition D.1.11(b)(2) and adding the type of records required to Conditions D.1.11(b)(3) and (4). These have not been made for the reasons indicated in Response 2. Therefore, there are no changes to the permit in response to this comment.

Comment 4:

NUTEC would like to remove page 37 of 41, FESOP Quarterly Report, based on the fact that all HAP used will be delivered to the applicator as discussed above. Also related to this, NUTEC would like to change the parameter for page 39 of 41, FESOP Quarterly Report, from "Total particulate HAPs delivered to the applicators and volatile HAPs used" to "Total HAPs used."

Response 4:

See paragraphs 1 through 3 of Response 3. There is no change to the permit.

**Indiana Department of Environmental Management
Office of Air Quality**

Technical Support Document (TSD) for a
Federally Enforceable State Operating Permit (FESOP)

Source Background and Description

Source Name:	NUTEC Coatings
Source Location:	1602 Wabash Avenue, Fort Wayne, Indiana 46801
County:	Allen
SIC Code:	3479
Operation Permit No.:	003-18344-00329
Permit Reviewer:	CarrieAnn Paukowits

The Office of Air Quality (OAQ) has reviewed a FESOP application from NUTEC Coatings relating to the construction and operation of a metal finishing source.

Permitted Emission Units and Pollution Control Equipment

There are no emission units permitted to operate at this source during this review process.

Unpermitted Emission Units and Pollution Control Equipment

There are no unpermitted emission units operating at this source during this review process.

New Emission Units and Pollution Control Equipment Receiving Advanced Source Modification Approval

The application includes information relating to the prior approval for the construction and operation of the following equipment pursuant to 326 IAC 2-8-4(11):

- (a) One (1) E-coat line, identified as EU-20A, a dipping operation not exhausting through a stack, capacity: 1,254 metal parts per hour.
- (b) One (1) drying oven, identified as EU-20B, fired by natural gas, exhausting to stack S/V-16, heat input capacity: 2.5 million British thermal units per hour.

The following emission units were previously permitted under a Title V Operating Permit for Tokheim Corporation (003-6870-00017), which was issued on December 31, 1998, and revoked on July 2, 2003. NUTEC Coatings purchased the source from Tokheim Corporation. The source consists of the following emission units and pollution control devices that were previously permitted:

- (a) One (1) Ransburg oven, identified as EU-06, constructed in October 1971, fired by natural gas, exhausting to stack S/V-06, heat input capacity: 5.0 million British thermal units per hour.
- (b) One (1) batch oven, identified as EU-08, constructed in June 1991, fired by natural gas, exhausting to stack S/V-08, heat input capacity: 1.0 million British thermal units per hour.
- (c) One (1) Ransburg spray booth, constructed in November 1971, consisting of:

- (1) One (1) automated spray booth, identified as EU-09A, equipped with electrostatic disk spray applicators and dry filters for overspray control, exhausting to stack S/V-09, capacity: 68 metal parts per hour.
 - (2) One (1) hand spray booth, identified as EU-09B, equipped with air atomized spray applicators and dry filters for overspray control, exhausting to stack S/V-10, capacity: 68 metal parts per hour.
 - (3) One (1) flash-off area, identified as EU-09C, exhausting to stack S/V-11, capacity: 68 metal parts per hour.
- (f) One (1) finishing spray line, constructed in September 1978, with a total capacity of 34 metal parts per hour, consisting of:
- (1) One (1) finish spray booth south, identified as EU-12A, equipped with air atomized spray guns and dry filters for overspray control, exhausting to stack S/V-12.
 - (2) One (1) finish spray booth north, identified as EU-12B, equipped with air atomized spray guns and dry filters for overspray control, exhausting to stack S/V-13.
- (g) One (1) silk screen oven, identified as EU-17, constructed in October 1971, fired by natural gas, exhausting to stack S/V-17, heat input capacity: 5.00 million British thermal units per hour.
- (h) One (1) powder coat line, constructed in June 1997, consisting of:
- (1) One (1) dry off oven, identified as EU-19A, fired by natural gas, exhausting to stacks S/V-19 and S/V-20, heat input capacity: 2.5 million British thermal units per hour.
 - (2) One (1) curing oven, identified as EU-19C, fired by natural gas, exhausting to stacks S/V-21 and S/V-22, heat input capacity: 3.5 million British thermal units per hour.
 - (3) One (1) powder spray booth, identified as EU-19B, using electro-deposition of coatings and a dry filter, not exhausting through a stack, capacity: 46 metal parts per hour and 5.75 pounds of coating per hour.
- (i) One (1) boiler, identified as EU-01, constructed in August 1964, fired by natural gas or a combination of 0-2.5% Butane and 97.5-100% Propane, exhausting to stack S/V-01, heat input capacity: 25.2 million British thermal units per hour.
- (j) One (1) boiler, identified as EU-02, constructed in August 1964, fired by natural gas or a combination of 0-2.5% Butane and 97.5-100% Propane, exhausting to stack S/V-02, heat input capacity: 25.2 million British thermal units per hour.

Insignificant Activities

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million BTU per hour, including one (1) boiler, constructed in 2004, rated at 0.000960 million British thermal units per hour.
- (b) Combustion source flame safety purging on startup.
- (c) The following VOC and HAP storage containers:
Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids.
- (d) Application of oils, greases, lubricants or other nonvolatile materials applied as temporary protective coatings.
- (e) Machining where an aqueous cutting coolant continuously floods the machining interface.
- (f) Solvent recycling systems with batch capacity less than or equal to 100 gallons.
- (g) Activities associated with the treatment of wastewater streams with an oil and grease content less than or equal to one percent (1%) by volume.
- (h) Noncontact cooling tower systems with either of the following:
 - (1) Natural draft cooling towers not regulated under a NESHAP.
 - (2) Forced and induced draft cooling tower system not regulated under a NESHAP.
- (i) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.
- (j) Heat exchanger cleaning and repair.
- (k) Paved and unpaved roads and parking lots with public access.
- (l) Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower.

Existing Approvals

There are no existing approvals issued, and currently in place, for this source.

Enforcement Issue

There are no enforcement actions pending.

Recommendation

The staff recommends to the Commissioner that the FESOP renewal be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An administratively incomplete FESOP renewal application for the purposes of this review was received on January 5, 2004. Additional information received on January 16, 2004, makes the FESOP renewal application administratively complete. Additional information was received on February 17, 2004.

There was no notice of completeness letter mailed to the source.

Emission Calculations

See pages 1 through 7 of 7 of Appendix A of this document for detailed emission calculations.

Potential to Emit

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as “the maximum capacity of a stationary source or emissions unit to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U.S. EPA, the department, or the appropriate local air pollution control agency.”

Pollutant	Potential to Emit (tons/yr)
PM	97.2
PM ₁₀	97.8
SO ₂	1.52
VOC	79.3
CO	24.8
NO _x	53.2

HAPs	Potential to Emit (tons/yr)
Xylenes	15.0
Napthalene	4.51
MIBK	1.64
Ethyl benzene	3.57
Toluene	4.51
Glycol Ethers	4.14
Antimony or Nickel	13.0
Benzene	0.0006
Dichlorobenzene	0.0004
Formaldehyde	0.023

HAPs	Potential to Emit (tons/yr)
Hexane	0.511
Toluene	0.001
Lead	0.0001
Cadmium	0.0003
Chromium	0.0004
Manganese	0.0001
Total	46.9

- (a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of any single HAP is equal to or greater than ten (10) tons per year and/or the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination of HAPs is equal to or greater than twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7. The source will be issued a FESOP because the source will limit its emissions below the Title V levels.
- (b) **Fugitive Emissions**
Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

Potential to Emit After Issuance

The table below summarizes the potential to emit, reflecting all limits of the emission units. Any control equipment is considered enforceable only after issuance of this FESOP and only to the extent that the effect of the control equipment is made practically enforceable in the permit. Since the source has not constructed any new emission units, the source's potential to emit is based on the emission units included in this FESOP.

Process/emission unit	Potential To Emit (tons/year)						
	PM	PM ₁₀	SO ₂	VOC	CO	NO _x	HAPs
One (1) E-coat line (EU-20A), one (1) Ransburg spray booth (EU-09A, B and C), one (1) finishing spray line (EU-12A and B), one (1) powder coat spray booth (EU-19B), and all associated flash off	94.6	94.6	-	76.7	-	-	9.00 individual 23.0 total
Combustion from one (1) drying oven (EU-20B), one (1) Ransburg oven (EU-06), one (1) batch oven (EU-08), one (1)	0.121	0.483	0.038	0.349	5.33	6.35	0.120

Process/emission unit	Potential To Emit (tons/year)						
	PM	PM ₁₀	SO ₂	VOC	CO	NO _x	HAPs
silk screen oven (EU-17), and powder spray line dry off oven and curing oven (EU-19A and C)							
Two (2) boilers (EU-01 and EU-02)	1.45	1.45	0.483	1.21	18.5	45.8	0.417
Insignificant Activities	1.00	1.00	1.00	1.00	1.00	1.00	<1.00 individual 1.00 total
Total Emissions	97.2	97.5	1.52	79.3	24.8	53.2	< 10 individual < 25 total

The values in the table represent the limited potential to emit of HAPs pursuant to 326 IAC 2-8-4, and the unrestricted potential emissions of all other criteria pollutants. The potential to emit from insignificant activities is conservatively estimated based on the insignificant activities listed in this document.

County Attainment Status

The source is located in Allen County.

Pollutant	Status
PM ₁₀	Attainment
SO ₂	Attainment
NO ₂	Attainment
Ozone	Attainment
CO	Attainment
Lead	Attainment

- (a) Volatile organic compounds (VOC) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Allen County has been designated as attainment or unclassifiable for ozone. Therefore, VOC emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability for the source section.
- (b) Allen County has been classified as attainment or unclassifiable for all remaining criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability for the source section.

Federal Rule Applicability

- (a) The two (2) boilers, identified as EU-01 and EU-02, are not subject to the requirements of 40 CFR 60, Subparts D, Da, Db or Dc because the boilers were constructed in 1964, which is prior to the earliest applicability date of these rules (August 17, 1971).
- (b) The one (1) insignificant boiler constructed in 2004, is not subject to the requirements of 40 CFR 60, Subparts D, Da, Db or Dc because the capacity of the boiler is 0.000960 million British thermal units per hour, which is less than the lowest capacity boiler to which these rules are applicable (10 million British thermal units per hour).
- (c) The potential to emit each individual HAP is limited to less than ten (10) tons per year, and the potential to emit any combination of HAPs is limited to less than twenty-five (25) tons per year in order to comply with 326 IAC 2-8-4, FESOP (see 326 IAC 2-8-4 (FESOP), below). Therefore, this source is not a major source of HAPs, and the requirements of 40 CFR 63, Subpart M, for Miscellaneous Metal Parts and Products Surface Coating, are not applicable.

State Rule Applicability – Entire Source

326 IAC 2-2 (Prevention of Significant Deterioration)

This source was initially constructed prior to August 7, 1977. Therefore, the requirement of 326 IAC 2-2, Prevention of Significant Deterioration (PSD) were not applicable. The source has since been modified. The unrestricted potential emissions of each criteria pollutant from this source, which is not one (1) of the twenty-eight (28) listed source categories, is less than two hundred and fifty (250) tons per year. Therefore, this source is not a major source pursuant to 326 IAC 2-2.

326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))

The operation of this metal finishing source will emit less than 10 tons per year of a single HAP or 25 tons per year of a combination of HAPs. Therefore, 326 IAC 2-4.1 does not apply.

326 IAC 2-6 (Emission Reporting)

This source is located in Allen County and the potential to emit of PM₁₀, VOC, CO, SO₂ and NO_x is less than one hundred (100) tons per year. Therefore, 326 IAC 2-6 does not apply.

326 IAC 2-8-4 (FESOP)

Pursuant to this rule, the amount of each individual HAP emitted shall be limited to less than ten (10) tons per year, and the potential to emit any combination of HAPs shall be limited to less than twenty-five (25) tons per year. Therefore, the requirements of 326 IAC 2-7, do not apply.

- (a) The amount of each individual particulate HAP delivered to the applicators at the total of all coating operations at this source shall not exceed 10.0 tons per consecutive twelve (12) month period, total, with compliance determined at the end of each month. Based on the minimum transfer efficiency of ten percent (10%), this is equivalent to individual particulate HAP emissions of no more than 9.00 tons per year from the coating operations and less than ten (10) tons per year from the entire source.

- (b) The amount of each individual volatile HAP used at the total of all coating operations at this source shall not exceed 9.00 tons per twelve (12) consecutive month period, with compliance determined at the end of each month. This is equivalent to individual volatile HAP emissions of no more than 9.00 tons per year from the coating operations and less than ten (10) tons per year from the entire source.
- (c) The amount of any combination of particulate HAPs delivered to the applicators and volatile HAPs used at the total of all coating operations at this source shall not exceed twenty-three (23) tons per twelve (12) consecutive month period, total, with compliance determined at the end of each month. This will limit the potential to emit total HAPs to no more than twenty-three (23) tons per year from the coating operations, and less than twenty-five (25) tons per year from the entire source.

326 IAC 5-1 (Visible Emissions Limitations)

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), opacity shall meet the following, unless otherwise stated in the permit:

- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

State Rule Applicability – Individual Facilities

326 IAC 6-2-3 (Particulate Emissions Limitations for Sources of Indirect Heating)

The two (2) boilers, identified as EU-01 and EU-02, both constructed prior to September 24, 1983, must comply with the PM emission limitations of 326 IAC 6-2-3. This limitation is based on the following equation given in 326 IAC 6-2-3:

$$Pt = C \times a \times h / 76.5 \times Q^{0.75} \times N^{0.25}$$

where:

Pt = Pounds of particulate matter emitted per million British thermal units (lb/MMBtu) heat input

Q = Total source maximum operating capacity rating in million British thermal units per hour (MMBtu/hr) heat input. The maximum operating capacity rating is defined as the maximum capacity at which the facility is operated or the nameplate capacity, whichever is specified in the facility's permit application, except when some lower capacity is contained in the facility's operation permit; in which case, the capacity specified in the operation permit shall be used.

C = Maximum ground level concentration with respect to distance from the point source at the "critical" wind speed for level terrain. This shall equal 50 micrograms per cubic meter for a period not to exceed a sixty (60) minute time period.

N = Number of stacks in fuel burning operation.

a = Plume rise factor which is used to make allowance for less than theoretical plume rise. The value 0.67 shall be used for Q less than or equal to 1,000 MMBtu/hr heat input. The value 0.8 shall be used for Q greater than 1,000 MMBtu/hr heat input.

h = Stack height in feet.

Pursuant to 326 IAC 6-2-3(d), the values in the equation shall represent the values for the total of all facilities in operation on June 8, 1972. The resulting Pt is the emission limitation for each boiler.

$$Pt = 50 \times 0.67 \times 40 / 76.5 \times (50.4)^{0.75} \times 2^{0.25} = 0.78 \text{ lb/MMBtu}$$

Based on Appendix A and AP-42, the potential to emit PM from each of these boilers is greater when operating on propane, and is:

$$0.6 \text{ lb/1,000 gal} \times 1 \text{ gal/0.0915 Btu} = 0.0066 \text{ lb/MMBtu}$$

Therefore, the two (2) boilers will comply with this rule.

326 IAC 6-2-4 (Particulate Emissions Limitations for Sources of Indirect Heating)

The one (1) insignificant boiler to be constructed in 2004, must comply with the PM emission limitations of 326 IAC 6-2-4. This limitation is based on the following equation given in 326 IAC 6-2-4:

$$Pt = 1.09 / Q^{0.26}$$

where:

Pt = Pounds of particulate matter emitted per million British thermal units (lb/MMBtu) heat input

Q = Total source maximum operating capacity rating in million British thermal units per hour (MMBtu/hr) heat input. The maximum operating capacity rating is defined as the maximum capacity at which the facility is operated or the nameplate capacity, whichever is specified in the facility's permit application, except when some lower capacity is contained in the facility's operation permit; in which case, the capacity specified in the operation permit shall be used.

$$Pt = 1.09 / (50.40096)^{0.26} = 0.39 \text{ lb/MMBtu}$$

Based on AP-42, the potential to emit PM from the boiler is:

$$1.90 \text{ lb/MMCF} \times 1 \text{ MMCF/1,000 MMBtu} = 0.0019 \text{ lb/MMBtu}$$

Therefore, the one (1) insignificant boiler will comply with this rule.

326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)

- (a) The one (1) E-coat line, identified as EU-20A, will use a dipping operation to apply coatings. Therefore, pursuant to 326 IAC 6-3-1(b)(5), the one (1) E-coat line is exempt from the requirements of 326 IAC 6-3-2.

- (b) The one (1) Ransburg spray booth, consisting of one (1) automatic spray booth (EU-09A) and one (1) hand spray booth (EU-09B); the one (1) finishing spray line, consisting of one (1) finish spray booth south (EU-12A) and one (1) finish spray booth north (EU-12B); and the one (1) powder spray booth at the powder coat line are all subject to the requirements of 326 IAC 6-3-2. Pursuant to 326 IAC 6-3-2(d), particulate from the surface coating shall be controlled by a dry particulate filter, and the Permittee shall operate the control device in accordance with manufacturer's specifications.
- (c) This source will operate according to a valid operating permit under 326 IAC 2-8. Therefore, the source is exempt from the requirements of 326 IAC 6-3-2(d)(2).

326 IAC 8-2-9 (Miscellaneous Metal Coating)

- (a) The one (1) Ransburg spray booth, consisting of one (1) automated spray booth (EU-09A) and one (1) hand spray booth (EU-09B) was constructed prior to 1980 in Allen County. Therefore, pursuant to 326 IAC 8-2-1, the requirements of 326 IAC 8-2-9 are not applicable.
- (b) The one (1) finishing spray line, consisting of one (1) finish spray booth south (EU-12A) and one (1) finish spray booth north (EU-12B) was constructed prior to 1980 in Allen County. Therefore, pursuant to 326 IAC 8-2-1, the requirements of 326 IAC 8-2-9 are not applicable.
- (c) The one (1) powder coat line, constructed after 1990 in Allen County, has potential VOC emissions less than 15 pounds per day. Therefore, the requirements of 326 IAC 8-2-9 are not applicable.
- (d) The one (1) proposed E-coat line, identified as EU-20A, has VOC emissions greater than 15 pounds per day. Therefore, the one (1) E-coat line is subject to the requirements of 326 IAC 8-2-9. Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volatile organic compound (VOC) content of the coating used at the E-coat line, which is a dipping operation, shall be limited to 3.5 pounds of VOCs per gallon of coating less water, for forced warm air dried coatings.

Solvent sprayed from application equipment during cleanup or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

Based on the MSDS submitted by the source and calculations made, the E-coat line is in compliance with this requirement.

326 IAC 8-6 (Organic Solvent Emission Limitations)

- (a) The one (1) Ransburg spray booth, which is not limited by any other rules in 326 IAC 8, was constructed prior to October 7, 1974, in Allen County. Therefore, the requirements of 326 IAC 8-6 are not applicable.
- (b) The one (1) finishing spray line, which is not limited by any other rules in 326 IAC 8, has unrestricted potential VOC emissions less than one hundred (100) tons per year. Therefore, the requirements of 326 IAC 8-6 are not applicable.

- (c) All other facilities at this source are either limited by other rules in 326 IAC 8 or do not have emissions from organic solvents.

Testing Requirements

There is no testing required for this source at this time.

Compliance Requirements

Permits issued under 326 IAC 2-8 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAQ in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-8-4. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also in Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The compliance monitoring requirements applicable to this source are as follows:

The surface coating facilities at this source have applicable compliance monitoring conditions as specified below:

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks (S/V-9, 10, 12 and 13) while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.
- (b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan -Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.
- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

These monitoring conditions are necessary because the dry filters must operate properly to ensure compliance with 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes).

Conclusion

The construction and operation of this a metal finishing source shall be subject to the conditions of the **FESOP 003-18344-00329**.

**Appendix A: Emissions Calculations
VOC and Particulate
From Surface Coating Operations**

Company Name: NUTEC Coatings
Address City IN Zip: 1602 Wabash Ave., Fort Wayne, IN 46801
Permit Number: 003-18344
Plt ID: 003-00329
Reviewer: CarrieAnn Paukowits
Application Date: January 5, 2004

Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency
EU-09A and B																
FDGH	10.09	54.000%	0.0%	54.0%	0.0%	53.00%	0.02000	68	5.45	5.45	7.41	177.84	32.46	24.88	10.28	10%
P-9962	11.10	31.300%	0.0%	31.3%	0.0%	54.00%	0.02000	68	3.47	3.47	4.73	113.40	20.70	40.88	6.43	10%
EU-12A and B																
FDGH	10.09	54.000%	0.0%	54.0%	0.0%	53.00%	0.02000	34	5.45	5.45	3.71	88.92	16.23	12.44	10.28	10%
EU-20A																
Paste CP639J	9.54	57.860%	45.5%	12.3%	52.1%	32.10%	0.00030	1254	2.46	1.18	0.44	10.63	1.94	0.00	3.67	100%
Resin CR935	8.65	76.500%	68.5%	8.0%	71.1%	20.29%	0.00140	1254	2.40	0.69	1.22	29.27	5.34	0.00	3.42	100%

PM Control Efficiency: 97.50%

State Potential Emissions **Add worst case coating to all solvents**

Uncontrolled	17.5	420	76.7	78.2
Controlled	17.5	420	76.7	1.96

METHODOLOGY

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)
Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)
Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)
Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)
Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)
Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) * (8760 hrs/yr) * (1 ton/2000 lbs)
Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)
Total = Worst Coating + Sum of all solvents used

Powder coating

Coating Usage (lbs/hr)	Weight % Solids	Transfer Efficiency	Particulate Potential (tons/yr)	Control Efficiency	Particulate Potential after Control (tons/yr)
5.75	100%	65.0%	16.4	99.9%	0.016

METHODOLOGY

Particulate Potential (tons/yr) = Coating Usage (lbs/hr) * (Weight % Solids) * (1-Transfer efficiency) * (8760 hrs/yr) * (1 ton/2000 lbs)
Particulate Potential after Control (tons/yr) = Particulate Potential (tons/yr) x (1 - Control Efficiency)

Appendix A: Emission Calculations
HAP Emission Calculations
From Surface Coating Operations

Company Name: NUTEC Coatings
Address City IN Zip: 1602 Wabash Ave., Fort Wayne, IN 46801
Permit Number: 003-18344
Plt ID: 003-00329
Reviewer: CarrieAnn Paukowits
Application Date: January 5, 2004

Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Xylene	Weight % Napthalene	Weight % MIBK	Weight % Ethyl benzene	Weight % Toluene	Weight % Glycol Ethers	Xylene Emissions (ton/yr)	Napthalene Emissions (ton/yr)	MIBK Emissions (ton/yr)	Ethyl benzene Emissions (ton/yr)	Toluene Emissions (ton/yr)	Glycol Ethers Emissions (ton/yr)	Total HAP Emissions (ton/yr)
EU-09A and B																
FDGH	10.09	0.02000	68	0.00%	5.00%	0.00%	0.00%	5.00%	0.00%	0.00	3.01	0.00	0.00	3.01	0.00	6.01
P-9962	11.10	0.02000	68	22.70%	0.00%	2.40%	5.40%	0.00%	0.00%	15.01	0.00	1.59	3.57	0.00	0.00	20.17
EU-12A and B				0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
FDGH	10.09	0.02000	34	0.00%	5.00%	0.00%	0.00%	5.00%	0.00%	0.00	1.50	0.00	0.00	1.50	0.00	3.01
EU-20A				0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Paste CP639J	9.54	0.00030	1254	0.00%	0.00%	0.32%	0.00%	0.00%	12.01%	0.00	0.00	0.05	0.00	0.00	1.89	1.94
Resin CR935	8.65	0.00140	1254	0.00%	0.00%	0.00%	0.00%	0.00%	3.39%	0.00	0.00	0.00	0.00	0.00	2.25	2.25

Total State Potential Emissions **15.0 4.51 1.64 3.57 4.51 4.14 33.4**

METHODOLOGY

HAPS emission rate (tons/yr) = Density (lb/gal) * Gal of Material (gal/unit) * Maximum (unit/hr) * Weight % HAP * 8760 hrs/yr * 1 ton/2000 lbs

Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Antimony or Nickel	Transfer Efficiency	Antimony or Nickel Emissions (tons/yr)
EU-09A and B						
FDGH	10.09	0.02000	68	70.00%	10.00%	8.65
EU-12A and B						
FDGH	10.09	0.02000	34	70.00%	10.00%	4.32

Total State Potential Emissions **13.0**

METHODOLOGY

HAPS emission rate (tons/yr) = Density (lb/gal) * Gal of Material (gal/unit) * Maximum (unit/hr) * Weight % HAP * 8760 hrs/yr * 1 ton/2000 lbs * (1-Transfer Efficiency)

**Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100
Small Industrial Boiler**

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Company Name: NUTEC Coatings
Address City IN Zip: 1602 Wabash Ave., Fort Wayne, IN 46801
Permit Number: 003-18344
Plt ID: 003-00329
Reviewer: CarrieAnn Paukowits
Application Date: January 5, 2004

Two (2) Boilers @ 25.2 MMBtu/hr each

Heat Input Capacity
MMBtu/hr

Potential Throughput
MMCF/yr

50.40

442

	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	1.90	7.60	0.600	100 **see below	5.50	84.0
Potential Emission in tons/yr	0.419	1.68	0.132	22.1	1.21	18.5

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.

**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 3

Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-C (SUPPLEMENT D 3/98)

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

See page 4 for HAPs emissions calculations.

Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100
Small Industrial Boiler
HAPs Emissions

Page 4 of 7 TSD App A

Company Name: NUTEC Coatings
Address City IN Zip: 1602 Wabash Ave., Fort Wayne, IN 46801
Permit Number: 003-18344
Pit ID: 003-00329
Reviewer: CarrieAnn Paukowits
Date: January 5, 2004

Two (2) Boilers @ 25.2 MMBtu/hr each

HAPs - Organics					
Emission Factor in lb/MMcf	Benzene 0.0021	Dichlorobenze 0.0012	Formaldehyd 0.0750	Hexane 1.8000	Toluene 0.0034
Potential Emission in tons/yr	0.0005	0.0003	0.017	0.397	0.0008

	HAPs - Metals					
Emission Factor in lb/MMcf	Lead 0.0005	Cadmium 0.0011	Chromium 0.0014	Manganese 0.0004	Nickel 0.0021	Total
Potential Emission in tons/yr	0.0001	0.0002	0.0003	0.00008	0.0005	0.417

Methodology is the same as page 3.

The five highest organic and metal HAPs emission factors are provided above.
 Additional HAPs emission factors are available in AP-42, Chapter 1.4.

Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100
Ovens

Page 5 of 7 TSD App A

Company Name: NUTEC Coatings
Address City IN Zip: 1602 Wabash Ave., Fort Wayne, IN 46801
Permit Number: 003-18344
Plt ID: 003-00329
Reviewer: CarrieAnn Paukowits
Application Date: January 5, 2004

One (1) Ransburg Oven @ 5.0 MMBtu/hr
One (1) Batch Oven @ 1.0 MMBtu/hr
Two (2) Drying Ovens @ 2.5 MMBtu/hr each
One (1) Curing Oven @ 3.5 MMBtu/hr

Heat Input Capacity
MMBtu/hr

Potential Throughput
MMCF/yr

14.50

127

	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	1.90	7.60	0.600	100 **see below	5.50	84.0
Potential Emission in tons/yr	0.121	0.483	0.038	6.35	0.349	5.33

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.

**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 3

Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-C (SUPPLEMENT D 3/98)

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

See page 6 for HAPs emissions calculations.

Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100
Ovens
HAPs Emissions

Page 6 of 7 TSD App A

Company Name: NUTEC Coatings
Address City IN Zip: 1602 Wabash Ave., Fort Wayne, IN 46801
Permit Number: 003-18344
Pit ID: 003-00329
Reviewer: CarrieAnn Paukowits
Application Date: January 5, 2004

One (1) Ransburg Oven @ 5.0 MMBtu/hr
One (1) Batch Oven @ 1.0 MMBtu/hr
Two (2) Drying Ovens @ 2.5 MMBtu/hr each
One (1) Curing Oven @ 3.5 MMBtu/hr

HAPs - Organics					
Emission Factor in lb/MMcf	Benzene 0.0021	Dichlorobenze 0.0012	Formaldehyd 0.0750	Hexane 1.8000	Toluene 0.0034
Potential Emission in tons/yr	0.0001	0.0001	0.005	0.114	0.0002

HAPs - Metals						
Emission Factor in lb/MMcf	Lead 0.0005	Cadmium 0.0011	Chromium 0.0014	Manganese 0.0004	Nickel 0.0021	Total
Potential Emission in tons/yr	0.00003	0.0001	0.0001	0.00002	0.0001	0.120

Methodology is the same as page 5.

The five highest organic and metal HAPs emission factors are provided above.
 Additional HAPs emission factors are available in AP-42, Chapter 1.4.

Appendix A: Emission Calculations

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LPG-Propane - Industrial Boilers**(Heat input capacity: > 10 MMBtu/hr and < 100 MMBtu/hr)****Company Name:** NUTEC Coatings**Address City IN Zip:** 1602 Wabash Ave., Fort Wayne, IN 46801**Permit Number:** 003-18344**Plt ID:** 003-00329**Reviewer:** CarrieAnn Paukowits**Application Date:** January 5, 2004**Two (2) Boilers @ 25.2 MMBtu/hr each on alternate fuel**Heat Input Capacity
MMBtu/hrPotential Throughput
kgals/yearSO₂ Emission factor = 0.10 x SS = Sulfur Content = 2.00 grains/100ft³

50.4

4825.18

	Pollutant					
	PM*	PM10*	SO ₂	NO _x	VOC	CO
Emission Factor in lb/kgal	0.6	0.6	0.2 (0.10S)	19.0	0.5 **TOC value	3.2
Potential Emission in tons/yr	1.45	1.45	0.483	45.8	1.21	7.72

*PM emission factor is filterable PM only. PM10 emission factor is assumed to be the same as PM based on a footnote in Table 1.5-1, therefore PM10 is filterable only as well.

**The VOC value given is TOC. The methane emission factor is 0.2 lb/kgal.

Methodology

1 gallon of LPG has a heating value of 94,000 Btu

1 gallon of propane has a heating value of 91,500 Btu (use this to convert emission factors to an energy basis for propane)

(Source - AP-42 (Supplement B 10/96) page 1.5-1)

Potential Throughput (kgals/year) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1kgal per 1000 gallon x 1 gal per 0.0915 MMBtu

Emission Factors are from AP42 (Supplement B 10/96), Table 1.5-1 (SCC #1-02-010-02)

Emission (tons/yr) = Throughput (kgals/yr) x Emission Factor (lb/kgal) / 2,000 lb/ton